

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA,)	CASE NO.: 1:23CR461
)	
Plaintiff,)	JUDGE CHARLES E. FLEMING
)	
v.)	
)	
DARMARIUS JEFFERSON,)	MOTION FOR ADDITIONAL TIME TO
DeSHONN BROWN,)	RESPOND TO THE INITIAL
)	PRESENTENCE INVESTIGATION
Defendants.)	REPORT

Now comes the United States of America, by and through its counsel, Rebecca C. Lutzko, United States Attorney, and Jennifer J. King, Assistant United States Attorney, and hereby respectfully requests additional time to respond to the Presentence Investigation Reports (PSR) prepared for defendants Damarius Jefferson and DeShonn Brown.

On May 14, 2024, the clerk's office released the initial PSR for Damarius Jefferson, and on May 16, 2024 released the initial PSR for DeShonn Brown. (ECF No. 38: First Disclosure of Presentence Report, PageID 117-34; ECF No. 39: First Disclosure of Presentence Report, PageID 135-50). Both PSRs found a discrepancy in the guideline calculation agreed upon by the parties in their respective written plea agreements and probation's determination the guideline calculation. (ECF No. 36: Plea Agreement, PageID 103-14; ECF No. 35: Plea Agreement, PageID 92-102).

The issue is the same in both cases and requires additional research. As such, the government is requesting until June 6, 2024 to respond.

Respectfully submitted,

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